

REMARKS

Claims 1-30 remain pending in the application.

The Applicants respectfully request that the Examiner reconsider earlier rejections in light of the following remarks. No new issues are raised nor is further search required as a result of the changes made herein. Entry of the Amendment is respectfully requested.

Claims 1-13, 15-28 and 30 over Haartsen in view of Chan

In the Office Action, claims 1-13, 15-28 and 30 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over U.S. Patent Application Publication No. 2002/0131486 to Haartsen ("Haartsen") in view of U.S. Patent No. 7,200,103 to Chan et al. ("Chan"). The Applicants respectfully traverse the rejection.

Claims 1-13, 15-28 and 30 recite, *inter alia*, a system and method of providing auxiliary coding comprising a station ID parameter of a transmitting home network device to a receiver, wherein the station ID parameter is used to perform a table look-up in a station pre-training table stored in the receiver to determine one or more training values associated with data packets on a packet-by-packet basis and allows the receiver to communicate with a plurality of stations having different transmission characteristics on a packet-by-packet basis.

The Examiner alleged that Haartsen discloses a home network in paragraph [0016] (Office Action, page 3). However, Haartsen in paragraph [0016], nor any other paragraph discloses a home network. In fact, Haartsen invention is directed toward the particular problems associated with long range communications between a transmitter and a receiver, such as an automobile (see Figure 1). It is well settled that each and every claim limitation must be considered. As specified in MPEP §2143.03, entitled "All Claim Limitations Must Be Taught or Suggested": "To establish prima facie obviousness of a claimed invention, all the claim limitations must be taught or suggested by the prior art. In re Royka, 490 F.2d 981, 180 USPQ 580 (CCPA 1974). 'All words in a claim must

be considered in judging the patentability of that claim against the prior art.' In re Wilson, 424 F.2d 1382, 1385, 165 USPQ 494, 496 (CCPA 1970)." MPEP §2143.03 at 2100-133 (Rev. 2, May 2004).

The Examiner acknowledged that Haartsen fails to disclose use of a station ID parameter (Office Action, page 4). The reason Haartsen fails to disclose use of a station ID parameter is that Haartsen is directed toward a system and method of training a receiver to mitigate for the effects of inter-symbol interference (ISI) caused by multi-path between a single transmitter and receiver (see Abstract; Fig. 1). Thus, modification of Haartsen that fails to disclose, teach or suggest application of his invention to any system besides one that relies on a single transmitter with a station ID parameter of a transmitting home network device is nonsensical because a single transmitter would not require an ID parameter to identify itself from other transmitters.

The Examiner acknowledged that Haartsen discloses a single transmitter and receiver (Office Action, page 4). However, the Examiner alleged that Haartsen simply discloses the concept of a single transmitter to receiver to illustrate the method of training a radio receiver in a simple way, but that it is well known in the art that radio communications not only incorporate a single transmitter and a single receiver but a plurality of transmitters and receivers (see Office Action, page 4). The Applicants respectfully disagree.

Haartsen's invention is directed toward mitigating the effects of ISI caused by multi-path (Abstract). Multi-path occurs when a signal can take a plurality of paths from a single transmitter to a single receiver. Thus, although Haartsen's invention can conceivably be applied to a plurality of transmitters and receivers, the communications that Haartsen is correcting for occur between a single transmitter and a single receiver.

The Examiner acknowledged that Haartsen fails to disclose a significant portion of the claimed features of claims 1-13, 15-28 and 30, i.e., providing auxiliary coding comprising a station ID parameter of a transmitting home network device to a receiver, wherein the station ID parameter is used to perform a table look-up in a station pre-training table stored in the receiver to

determine one or more training values associated with data packets on a packet-by-packet basis and allows the receiver to communicate with a plurality of stations having different transmission characteristics on a packet-by-packet basis (Office Action, page 4). The Examiner relies on Chan to allegedly make up for the deficiencies in Haartsen to arrive at the claimed features. The Applicants respectfully disagree.

The Examiner alleged that Chan discloses "a multiuser communication system comprising at least two user transmitters and a receiver having an antenna for receiving signals from the transmitters (allow said receiver (receiver 14 of figure 1) to communicate with a plurality of stations (receivers 12 of figure 1) having different transmission characteristics on a packet-by-packet basis co2 lines 25-30 and figure 1)." (Office Action, page 4). Thus, the Examiner alleged that Chan discloses transmitters having difference transmission characteristics on a packet-by-packet basis. However, claims 1-13 and 15 recite determining one or more training values associated with data packets on a packet-by-packet basis. Chan, as the Examiner apparently agrees with the lack of indication in Chan, fails to disclose, teach or suggest determining one or more training values associated with data packets on a packet-by-packet basis, as recited by claims 1-13, 15-28 and 30.

Moreover, the Examiner alleged that Chan discloses a plurality of stations, Chan's receivers 12 in Figure 1, having different transmission characteristics on a packet-by-packet basis at col. 2, lines 25-30. However, Chan at col. 2, lines 25-30, nor anywhere else in Chan, disclose, teach or suggest anything being performed on a packet-by-packet basis, much less determining one or more training values associated with data packets on a packet-by-packet basis, as recited by claims 1-13, 15-28 and 30.

Moreover, Chan like Haartsen fails to disclose, teach or suggest any application of his invention to a home network device. In fact, Chan's invention is directed toward cellular communications (see Figure 1). Thus, neither Haartsen nor Chan are directed toward a home network device, much less a system and method of providing auxiliary coding comprising a station ID

parameter of a transmitting home network device to a receiver, as recited by claims 1-13, 15-28 and 30.

Moreover, the Examiner's motivation to modify Haartsen with the disclose of Chan is to correctly and successfully equalize a receiver to a correct transmitter (Office Action, page 5). However, as discussed above Haartsen's invention is specifically directed toward correcting for multi-path that occurs from of a single transmitter. Modifying Haartsen to equalize a receiver to a correct transmitter is nonsensical motivation in the context of Haartsen's invention that is specifically directed toward multi-path that occurs between a single transmitter and a single receiver.

Thus, even if it were obvious to modify Haartsen with the disclosure of Chan, which it is not as discussed above, the theoretically modified Haartsen would still fail to disclose, teach or suggest use of auxiliary coding comprising a station ID parameter of a transmitting home network device to a receiver, wherein the station ID parameter is used to perform a table look-up in a station pre-training table to determine one or more training values associated with data packets on a packet-by-packet basis, much less to allow the receiver to communicate with a plurality of stations having different transmission characteristics on a packet-by-packet basis, as recited by claims 1-13, 15-28 and 30.

Accordingly, for at least all the above reasons, claims 1-13, 15-28 and 30 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Claims 14 and 29 over Haartsen in view of Dorenbosch, Nee and Chung

In the Office Action, claims 14 and 29 were rejected under 35 U.S.C. §103(a) as allegedly being obvious over Haartsen in view of Chan, and further in view of U.S. Patent No. 6,731,618 to Chung *et al.* ("Chung"). The Applicants respectfully traverse the rejection.

Claims 14 and 29 are dependent on claims 1 and 16 and are patentable over the prior art for the same reasons as claims 1 and 16.

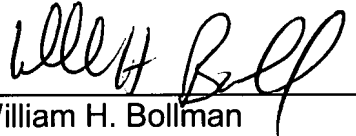
Claims 14 and 29 contain the additional limitation of having the auxiliary coding be provided in a signal independent from a signal including the data packet. The Office Action relies on Chung to disclose this additional limitation. Office Action, p. 7). As discussed above, however, the assumed combination of Haartsen and Chan fails to disclose or suggest a system and method of providing auxiliary coding comprising a station ID parameter of a transmitting home network device to a receiver, wherein the station ID parameter is used to perform a table look-up in a station pre-training table stored in the receiver to determine one or more training values associated with data packets on a packet-by-packet basis, and allowing the receiver to communicate with a plurality of stations having different transmission characteristics on a packet-by-packet basis, as recited by claims 14 and 29. Even if Haartsen and Chan are further modified by Chung, this assumed combination would still not disclose or suggest the foregoing limitations, as recited by claims 14 and 29.

Accordingly, for at least all the above reasons, claims 14 and 29 are patentable over the prior art of record. It is therefore respectfully requested that the rejection be withdrawn.

Conclusion

All objections and rejections having been addressed, it is respectfully submitted that the subject application is in condition for allowance and a Notice to that effect is earnestly solicited.

Respectfully submitted,

A handwritten signature in black ink, appearing to read "William H. Bollman", written over a horizontal line.

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